

# ***LEEDS BROWN LAW, P.C.***

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September 15, 2020

**Via ECF**

Hon. Joan M. Azrack  
Eastern District of New York  
United States Federal Courthouse  
100 Federal Plaza, Courtroom 920  
Central Islip, NY 11722

**Re: *Wall v. Do & Co New York Catering, Inc.***  
**Case No. 18-cv-3725 (ADS)(AKT)**

Dear Judge Azrack:

This firm represents Plaintiff in the above-referenced matter. Prior to your Honor being assigned to the case, we had written the Court to request an order, compelling Defendant's response to Plaintiff's First Post-Judgment Set of Interrogatories and Request for the Production of Documents and to appear for a 30(b)(6) deposition (Document No. 38). Since Your Honor was not yet assigned to the case, we wanted to make you aware of the outstanding request.

To reiterate, on March 12, 2020, Plaintiff accepted Defendant's Offer of Judgment. Judgement was entered by the Clerk of the Court on March 17, 2020. Attached hereto as Exhibit A is the Judgement. Defendant failed to pay the Judgment. On May 6, 2020, Plaintiff served Defendant with Post-Judgment Set of Interrogatories and Request for the Production of Documents and, on May 7, 2020, Plaintiff served a notice of deposition pursuant to CPLR Rules 30(b)(6) and 69(a)(2). See attached hereto as Exhibits B and C, respectively. The interrogatories and Document requests were made returnable by June 5, 2020.

Although Plaintiff agreed to temporarily adjourn the taking of depositions due to ongoing settlement discussions, the parties were unable to reach a resolution. To date, the Defendant has not responded to our discovery requests or provided any indication of their intention to respond despite repeated reminders via email and telephone. We respectfully request that the Court compel Defendant's response to the document requests and interrogatories and compel Defendant to produce a 30(b)(6) witness for deposition.

We thank Your Honor for your assistance.

Sincerely,

LEEDS BROWN LAW, P.C.

/s/

Rick Ostrove

cc: All Counsel via ECF